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13 Attorneys for The Roman Catholic  
14 Archbishop of San Francisco

UNITED STATES BANKRUPTCY COURT

NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

17 In re Case No. 23-30564  
18 THE ROMAN CATHOLIC ARCHBISHOP Chapter 11  
OF SAN FRANCISCO,  
19  
20 Debtor and Debtor in Possession. **JOINT STATEMENT  
COMMITTEE IN  
STATES TRUSTEE**

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## JOIN COMMIT

**JOINT STATEMENT OF DEBTOR AND  
COMMITTEE IN RESPONSE TO UNITED  
STATES TRUSTEE'S SUPPLEMENTAL  
BRIEF IN SUPPORT OF UNITED STATES  
TRUSTEE'S MOTION FOR ORDER  
APPOINTING FEE EXAMINER**

*[No Hearing Requested]*

24 The Roman Catholic Archbishop of San Francisco, the debtor and debtor in possession (the  
25 “RCASF” or the “Debtor”) in the above-captioned chapter 11 case (the “Bankruptcy Case”), and  
26 the Official Committee of Unsecured Creditors (the “Committee”), by its undersigned counsel,  
27 submit this joint statement in response to the *United States Trustee’s Supplemental Brief in Support*

1 *of United States Trustee's Motion for Order Appointing Fee Examiner* [ECF No. 493] filed on  
2 February 21, 2024 (the "Supplemental Fee Examiner Brief").

3 The Debtor and the Committee have (a) reviewed the Supplemental Fee Examiner Brief filed  
4 by Tracy Hope Davis, United States Trustee for Region 17, (b) evaluated all of the proposed fee  
5 examiner candidates, and (c) met and conferred regarding the proposed appointment of these  
6 candidates.

7 Upon meeting and conferring, the Debtor and the Committee believe that under the  
8 circumstances, Elise S. Frejka ("Ms. Frejka") of Frejka PLLC is the most appropriate candidate to  
9 be appointed as fee examiner in the Bankruptcy Case.

10 The Debtor and Committee understand that Ms. Frejka is willing to provide fee examiner  
11 services in this Bankruptcy Case under a compensation structure of \$530/hour and reimbursement  
12 of actual expenses, subject to Court approval under standards analogous to sections 327, 330 and  
13 331 of the Bankruptcy Code.

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1 The Debtor and Committee support Ms. Frejka's appointment on such terms.  
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5 Dated: February 26, 2024

6 FELDERSTEIN FITZGERALD  
7 WILLOUGHBY PASCUZZI & RIOS LLP

8 By

9 /s/ Paul J. Pascuzzi

10  
11 PAUL J. PASCUZZI  
12 JASON E. RIOS  
13 THOMAS R. PHINNEY  
14 Attorneys for The Roman Catholic  
15 Archbishop of San Francisco

16 Dated: February 26, 2024

17 SHEPPARD, MULLIN, RICHTER & HAMPTON LLP

18 By

19 /s/ Ori Katz

20 ORI KATZ  
21 ALAN H. MARTIN  
22 Attorneys for The Roman Catholic  
23 Archbishop of San Francisco

24 Dated: February 26, 2024

25 PACHULSKI STANG ZIEHL & JONES LLP

26 By

27 /s/ James I. Stang

28 JAMES I. STANG  
BRITTANY M. MICHAEL (admitted *pro hac vice*)  
Counsel to the Official Committee of Unsecured  
Creditors